

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

JOSE LUIS CARRIZALES,  
*Plaintiff,*

v.

LOWE'S HOME CENTERS, LLC  
*Defendant.*

§  
§  
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§  
§  
§  
§

CIVIL ACTION NO. \_\_\_\_\_  
JURY TRIAL DEMANDED

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**DEFENDANT LOWE'S HOME CENTERS, LLC'S  
INDEX OF MATTERS BEING FILED**

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Defendant, LOWE'S HOME CENTERS, LLC ("Lowe's"), files this Index of Matters Being Filed pursuant to Local Rule 81 of the Southern District of Texas, as follows:

Exhibit 1: All Executed Process:

- Notice of Service of Process to Lowe's Home Centers, LLC

Exhibit 2: All State Court Pleadings:

- Plaintiff's Original Petition filed on July 2, 2021
- Defendant Lowe's Original Answer filed on August 23, 2021

Exhibit 3: State Court Docket Sheet

Exhibit 4: List of all counsel of record, including addresses, telephone numbers, and parties represented

# EXHIBIT 1

*(All Executed Service of Process)*



## Notice of Service of Process

null / ALL  
Transmittal Number: 23562375  
Date Processed: 07/30/2021

**Primary Contact:** Heather McClow  
Lowe's Companies, Inc.  
1000 Lowes Blvd  
Mooresville, NC 28117-8520

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<b>Entity:</b>	Lowe's Home Centers, LLC Entity ID Number 2515365
<b>Entity Served:</b>	Lowe's Home Centers, LLC
<b>Title of Action:</b>	Jose Luis Carrizales vs. Lowe's Home Centers, LLC
<b>Matter Name/ID:</b>	Jose Luis Carrizales vs. Lowe's Home Centers, LLC (11445704)
<b>Document(s) Type:</b>	Citation/Petition
<b>Nature of Action:</b>	Personal Injury
<b>Court/Agency:</b>	Cameron County District Court, TX
<b>Case/Reference No:</b>	2021-DCL-03919-A
<b>Jurisdiction Served:</b>	Texas
<b>Date Served on CSC:</b>	07/29/2021
<b>Answer or Appearance Due:</b>	10:00 am Monday next following the expiration of 20 days after service
<b>Originally Served On:</b>	CSC
<b>How Served:</b>	Certified Mail
<b>Sender Information:</b>	Javier Villarreal 956-544-4444

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Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

CITATION – PERSONAL SERVICE – TRCP 99

THE STATE OF TEXAS

2021-DCL-03919-A

Jose Luis Carrizales § IN THE 107TH DISTRICT COURT  
VS § OF  
Lowe's Home Centers, LLC § CAMERON COUNTY, TEXAS

TO **Lowe's Home Centers, LLC**  
**Serving Registered Agent, Corporation Service Company dba**  
**CSC – Lawyers Incorporating Service Company**  
**211 E 7th Street Suite 620**  
**Austin TX 78701-3218**

**NOTICE TO DEFENDANT:** "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at [TexasLawHelp.org](http://TexasLawHelp.org)." TRCP. 99

You are hereby commanded to appear by filing a written answer to **Plaintiff's Original Petition** at or before 10:00 o'clock A.M. on the Monday next after the expiration of 20 days after the date of service of this citation before the Honorable 107th District Court of Cameron County, at the Courthouse in said County in Brownsville, Texas. Said **Plaintiff's Original Petition** was filed in said court on **July 02, 2021**, in the above entitled cause.

2021-DCL-03919

Jose Luis Carrizales  
vs.  
Lowe's Home Centers, LLC

The nature of Petitioner's demand is fully shown by a true and correct copy of **Plaintiff's Original Petition** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at Brownsville, Texas, on this the 16th day of July, 2021.

ATTORNEY:  
**Reggie Blakeley**  
**24077845**

**956-544-4444**  
**2401 Wild Flower Drive Suite A**  
**Brownsville TX 78526**



**Laura Perez-Reyes**  
District Clerk of Cameron County  
974 E Harrison St.  
Brownsville, Texas 78520

By Rosa Maria Ochoa  
Rosa Maria Ochoa, Deputy Clerk

**2021-DCL-03919**  
**107th District Court**

**Jose Luis Carrizales**  
**vs.**  
**Lowe's Home Centers, LLC**

### RETURN OF SERVICE

Executed when copy is delivered:

This is a true copy of the original citation, was delivered to defendant \_\_\_\_\_, on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

NAME/ADDRESS FOR SERVICE

\_\_\_\_\_  
 \_\_\_\_\_ Officer  
 \_\_\_\_\_ County, TX

By: \_\_\_\_\_ Deputy

### OFFICERS RETURN

Came to hand on the \_\_\_\_ day of \_\_\_\_\_, at \_\_\_\_ o'clock \_\_\_\_ m and \_\_\_\_\_ County, Texas, by delivering to each of the within named defendants in person, a true copy of this \_\_\_\_\_ with the date of delivery endorsed thereon, together with the accompanying copy of the \_\_\_\_\_ at the following times and places, to wit:

NAME	DATE/TIME	PLACE/COURSE/DISTANCE FROM COURTHOUSE

And not executed as to the defendant(s), \_\_\_\_\_  
 The diligence used in finding said defendant(s) being: \_\_\_\_\_

and the cause or failure to execute this process is: \_\_\_\_\_

and the information received as to the whereabouts of said defendant(s) being: \_\_\_\_\_

FEES:

SERVING PETITION/COPY \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_ Officer  
 \_\_\_\_\_ County, TX

By: \_\_\_\_\_ Deputy

\_\_\_\_\_  
 AFFIANT

### COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return shall be signed under penalty or perjury and contain the following statement:

"My name is \_\_\_\_\_, my date of birth is \_\_\_\_\_, my address is \_\_\_\_\_

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED in \_\_\_\_\_ County, State of \_\_\_\_\_, on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
 ID Number/Expiration of Certification

\_\_\_\_\_  
 Declarant/Authorized Process Server

# EXHIBIT 2

*(All State Court Pleadings)*

CAUSE NO. 2021-DCL-03919**JOSE LUIS CARRIZALES**  
Plaintiff,

V.

**LOWE'S HOME CENTERS, LLC**  
Defendants.§  
§  
§  
§  
§  
§  
§**IN THE DISTRICT COURT**  
Cameron County - 107th District Court\_\_\_\_ **JUDICIAL DISTRICT****CAMERON COUNTY, TEXAS**

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**PLAINTIFF'S ORIGINAL PETITION**

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**TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW COMES PLAINTIFF, JOSE LUIS CARRIZALES**, complaining of and about **LOWE'S HOME CENTERS, LLC**, hereinafter called Defendant, and for cause of action show unto the Court the following:

**1.****DISCOVERY CONTROL PLAN LEVEL**

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1.1 Discovery shall be conducted under Level 3 pursuant to Rule 190.4 of the Texas Rules of Civil Procedure.

**2.****PARTIES AND SERVICE**

2.1 Plaintiff, **JOSE LUIS CARRIZALES**, is an individual residing in Cameron County, Texas.

2.2 Defendant **LOWE'S HOME CENTERS, LLC**, (hereinafter "LOWE'S") a Domestic Limited Liability Company based in Texas, is organized under the laws of the State of Texas, is authorized to do business in Texas and may be served with process by serving its registered agent, Corporation Service Company dba CSC - Lawyers

*Plaintiff's Original Petition*



Incorporating Service Company, 211 E., 7<sup>th</sup> Street, Suite 620, Austin, Texas 78701-3218. Service of said Defendant as described above can be effected by certified mail, return receipt requested.

**3.**  
**JURISDICTION AND VENUE**

3.1 The subject matter in controversy is within the jurisdictional limits of this court. This court has jurisdiction over the parties because the Defendant is Texas residents.

3.2 Venue in Cameron County is proper in this cause under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

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**4.**  
**FACTS**

4.1 This lawsuit arises out of an event that occurred on or about July 2, 2019, at a LOWE'S HOME CENTERS, LLC, located at 4705 S. Expressway 77 & 83, Harlingen, Texas 78550 (hereinafter "the Store").

4.2 At all times material hereto, Defendant, LOWE'S HOME CENTERS, LLC, were the owners of the Store.

4.3 On July 2, 2019, Mr. Carrizales, accompanied by two nephews, walked into a Lowe's store located in Harlingen, Texas to purchase some lumber. As Mr. Carrizales and his nephews were walking down the aisle they noticed the material they sought were above eye-level on the right side of the aisle. As they proceeded down the

aisle looking for the items they needed, Mr. Carrizales unexpectedly came upon and tripped on a forklift/jack that had been left unattended by Lowe's employees. Mr. Carrizales further was not able to see the forks due to the same contrast as the concrete floor. Therefore, the forklift/jack was placed in an unsafe area and manner. In addition, the Store failed to warn the invitees of the hazard forklift/jack presented. As a result of the Store's failure to maintain a safe premises for its customers and not placing adequate warning signs around the hazardous area, Mr. CARRIZALES sustained severe bodily injuries due to his fall to the pavement floor.

#### The Injuries

4.4 JOSE LUIS CARRIZALES suffered physical and emotional injuries as a result of this incident, including, but not limited to, pain to his left wrist/hand, back, and neck. He has undergone physical therapy and daily medications in an attempt to control the pain caused by the injuries sustained in this incident. Mr. CARRIZALES has undergone an MRI of cervical spine and has been diagnosed with the following:

- 1) **3 mm** posterior and central disc herniation at **C2-C3**;
- 2) **2 mm** posterior disc bulge at **C3-C4**;
- 3) **3 mm** posterior and central disc herniation at **C4-C5**;
- 4) **3 mm** posterior and central disc herniation at **C5-C6**;
- 5) **2 mm** posterior disc bulge at **C6-C7**; and
- 6) **2 mm** posterior disc bulge at **C7-T1**.

In all reasonable probability, Mr. CARRIZALES will continue to incur medical expenses to alleviate his pain including, but not limited to, interventional pain management treatments, physical therapy, and additional medications.

**5.**  
**PLAINTIFF'S CLAIM OF**  
**– NEGLIGENCE AGAINST LOWE'S HOME CENTERS, LLC–**

5.1 As described above and referenced herein, Mr. CARRIZALES entered Defendant's place of business with the Defendant's expressed or implied knowledge and for its mutual benefit. Specifically, Mr. CARRIZALES entered the Store for the purpose of making a purchase.

5.2 At all times mentioned herein, Defendant, LOWE'S owned the property in question, located on 4705 S. Expressway 77 & 83, Harlingen, Texas 78550.

5.3 Prior to and at the time of the accident, the premises posed an unreasonable risk of harm in due to the unsafe placement of the fork lift/jack that was improperly and dangerously exposed in the lumber area of the Store that caused Plaintiff's injuries.

5.4 The Defendant, LOWE'S, its agents, servants, and/or employees knew or reasonably should have known of the dangerous condition and the risk of harm that the surface conditions of its store floor posed to its patrons. In particular, the Defendant had a duty to maintain its parking lot area in a safe and proper condition so as to prevent falls and creating a dangerous condition that would likely result in the injury of its customers.

5.5 In addition to showing that the pavement floor had not been properly maintained, the Plaintiff would show the Court that the condition of the floor had

continued for such an extended period of time that the Defendant should have realized that a dangerous condition existed; which was likely to result in the injury of one of its patrons. Defendant, through its employees, should have discovered the dangerous condition by keeping a proper lookout. Specifically, the Defendant should have reasonably known of the unreasonable risk of harm it possessed and the likelihood that its patrons, including the Plaintiff, would trip and fall.

5.6 Defendant, LOWE'S is liable for the Plaintiff's injuries due to the negligence of its agents who were acting in the regular course and scope of their employment. Defendant is guilty of negligence based on the following actions and/or omissions of its employees/agents:

- 5.6.1 Failing to maintain the pavement floor in a reasonably safe condition;
- 5.6.2 Failing to properly inspect and maintain the pavement floor area in question to discover the dangerous condition;
- 5.6.3 Failing to properly inspect the premises and drain cover in question;
- 5.6.4 Failing to place signs to warn Plaintiff of the unsafe condition of the flooring area;
- 5.6.5 Failing to supervise and correct the unreasonably dangerously placed forklift/jack;
- 5.6.6 Failing to make the condition reasonably safe to prevent the Plaintiff from tripping and falling;
- 5.6.7 Failing to maintain sufficient lighting in the hazardous area around the drain cover to warn it patrons of the dangerous condition in the store's lumber department.

5.7 The injuries sustained by the Plaintiff were proximately caused by the Defendant's negligence.

**6.**

**DAMAGES FOR PLAINTIFF, JOSE LUIS CARRIZALES**

6.1 As a direct and proximate result of the occurrence made the basis of this lawsuit the Plaintiff, JOSE LUIS CARRIZALES, was caused to suffer bodily injury, and to incur the following damages:

- 6.1.1 Reasonable medical care and expenses in the past. These expenses were incurred by Plaintiff, JOSE LUIS CARRIZALES for the necessary care and treatment of the injuries resulting from the accident complained of herein and such charges are reasonable and were usual and customary charges for such services in Cameron County, Texas;
- 6.1.2 Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future;
- 6.1.3 Physical pain and suffering in the past and in the future;
- 6.1.4 Physical impairment in the past and which, in all reasonable probability, will be suffered in the future; and
- 6.1.5 Mental anguish in the past and in the future.

**7.**

**MAXIMUM AMOUNT CLAIMED**

7.1 Plaintiff seeks damages within the jurisdictional limits of this court. Pursuant to pleading requirements under Texas Rules of Civil Procedure 47, Plaintiff

affirmatively pleads that she seeks monetary relief over \$200,000.00 but no more than \$1,000,000.00.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff, JOSE LUIS CARRIZALES, respectfully prays that the Defendant be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendant for damages in an amount within the jurisdictional limits of the Court; together with pre-judgment interest; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Respectfully submitted,

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**LAW OFFICES OF JAVIER VILLARREAL**  
2401 Wildflower Drive, Suite A  
Brownsville, Texas 78520  
Tel: (956) 544-4444  
Fax: (956) 550-0877

By: **/s/ Javier**

**Villarreal**

Javier Villarreal  
State Bar No. 240028097  
[jv@jvlawfirm.com](mailto:jv@jvlawfirm.com)

**COUNSEL FOR PLAINTIFF**

**PLAINTIFF DEMANDS A TRIAL BY JURY**

**COURTESY NOTICE TO DEFENDANT**

If you had insurance at the time of the accident, please forward a copy of this petition to your insurance company *immediately*.

Lowe's Companies-Risk Management Dept.  
P.O. Box 14072  
Lexington, KY 40512  
**Attn: Ralph J. Wallace, Jr.**  
Phone No.: 1-800-775-6937  
Facsimile: 859-264-4066

Our file No. 301929788240001  
Claimant: JOSE LUIS CARRIZALES  
DOL: 07/02/2019

# South Texas Investigative Services

1308 COSTA DEL SOL DRIVE  
BROWNSVILLE, TEXAS 78520  
TEL: 956-455-3535  
EMAIL: STIS.INVESTIGATIONS@YAHOO.COM

July 26, 2021

Lowe's Home Centers, LLC Via CMRRR70201290000024148475  
CSC-LAWYERS INCORPORATING SERVICE COMPANY  
211 E. 7<sup>TH</sup> Street Suite 620  
Austin, Texas 78701-3218

Re: Cause No. 20201-DCL-03919-A; *Jose Luis Carrizales VS. Lowe's Home Centers, LLC*; In the 107<sup>th</sup> Judicial District Court; Cameron County, Texas

To Whom It May Concern:

As the registered agent for Lowe's Home Centers. LLC, enclosed herewith, please find the following documents:

*Plaintiffs' Original Petition; and*

*Citation to State of Texas.*

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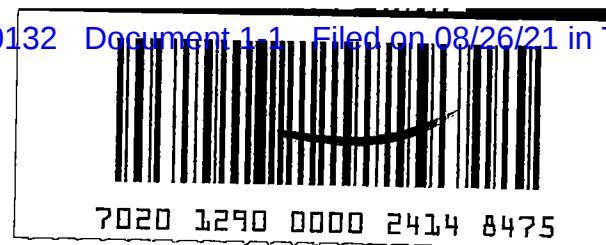
~~Should you have any questions or concerns, please do not hesitate to contact me.~~

Cordially,

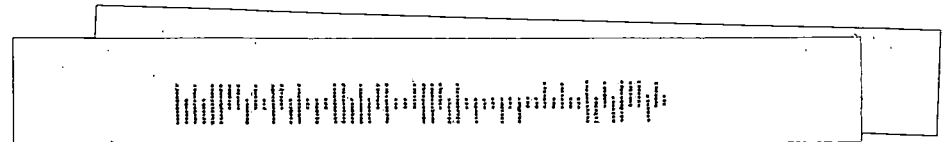
Gerard Serrata  
Authorized Process Server  
License # A12921  
(956) 455-3535



**Gerard Serrata**  
**1308 Costa Del Sol**  
**Brownsville TX 78520**



Lowie's Home Centers, LLC  
Serving Registered Agent, Corp. Service Comp.  
CSC - Lawyers Incorporating Service Comp.  
211 E. 7th Street, Suite 620  
Austin, TX 78701-3218



CAUSE NO. 2021-DCL-03919-A

JOSE LUIS CARRIZALES,	§	IN THE DISTRICT COURT
<i>Plaintiff,</i>	§	
	§	
v.	§	107TH JUDICIAL DISTRICT
	§	
LOWE'S HOME CENTERS, LLC,	§	
<i>Defendant.</i>	§	CAMERON COUNTY, TEXAS

---

**DEFENDANT LOWE'S HOME CENTERS, LLC'S ORIGINAL ANSWER  
TO PLAINTIFF'S ORIGINAL PETITION**

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Defendant, Lowe's Home Centers, LLC, hereby files its Original Answer to Plaintiff's Original Petition as follows:

**GENERAL DENIAL**

1. Defendant denies each and every, all and singular, the material allegations contained within Plaintiff's pleadings and demands strict proof thereof.

**AFFIRMATIVE DEFENSE**

2. Pleading further, alternatively, and by way of affirmative defense, Defendant asserts that it is not liable to Plaintiff because Plaintiff's personal injury claim under the theory of negligence is barred by the two year statute of limitations in Texas Civil Practice & Remedies Code § 16.003. Plaintiff's claim accrued on July 2, 2019, when he allegedly sustained personal injuries made the basis of this lawsuit. Plaintiff filed suit

on July 2, 2021 but did not serve Defendant with service until July 29, 2021 via certified mail.

**PRAYER FOR RELIEF**

Defendant prays that Plaintiff take nothing by this lawsuit, that Defendant go hence with its costs without delay, and for such other and further relief, both general and special, at law and in equity, to which Defendant may show itself justly entitled.

Respectfully submitted,

**MAYER LLP**

4400 Post Oak Parkway, Suite 1980  
Houston, Texas 77027  
713.487.2000 / Fax 713.487.2019

By: *Raul I. Saenz*

Kevin P. Riley  
State Bar No. 16929100  
E-Mail: [kriley@mayerllp.com](mailto:kriley@mayerllp.com)  
Raul I. Saenz  
State Bar No. 24093092  
E-Mail: [rsaenz@mayerllp.com](mailto:rsaenz@mayerllp.com)

**ATTORNEYS FOR DEFENDANT  
LOWE'S HOME CENTERS, LLC**

**CERTIFICATE OF SERVICE**

This is to certify that on the 23rd day of August 2021, a true and correct copy of the foregoing has been forwarded to all counsel of record as follows:

Javier Villareal  
LAW OFFICES OF JAVIER VILLAREAL  
2401 Wildflower Drive, Suite A  
Browsville, Texas 78520  
[jv@jvlawfirm.com](mailto:jv@jvlawfirm.com)  
**ATTORNEY FOR PLAINTIFF**

☒ E-MAIL/E-SERVICE  
☐ HAND DELIVERY  
☐ FACSIMILE  
☐ OVERNIGHT MAIL  
☐ REGULAR, FIRST CLASS MAIL  
☐ CERTIFIED MAIL/RETURN RECEIPT REQUESTED

*Raul I. Saenz*

Raul I. Saenz

**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Kathryn Keefer on behalf of Raul Saenz  
 Bar No. 24093092  
 kkeef@mayerllp.com  
 Envelope ID: 56543341  
 Status as of 8/23/2021 11:02 AM CST

Associated Case Party: JoseLuisCarrizales

Name	BarNumber	Email	TimestampSubmitted	Status
Javier Villarreal		jv@jvlawfirm.com	8/23/2021 10:23:46 AM	SENT

Associated Case Party: Lowe's Home Centers, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Kathy Keefer		kkeef@mayerllp.com	8/23/2021 10:23:46 AM	SENT
Kevin Riley		kriley@mayerllp.com	8/23/2021 10:23:46 AM	SENT
Raul Saenz		rsaenz@mayerllp.com	8/23/2021 10:23:46 AM	SENT
Elizabeth Trevino		etrevino@mayerllp.com	8/23/2021 10:23:46 AM	SENT
Chrysa Williams		CWilliams@mayerllp.com	8/23/2021 10:23:46 AM	SENT

CAUSE NO. 2021-DCL-03919-A

JOSE LUIS CARRIZALES,  
*Plaintiff,*

v.

LOWE'S HOME CENTERS, LLC,  
*Defendant.*§  
§  
§  
§  
§  
§  
§IN THE DISTRICT COURT  
  
107TH JUDICIAL DISTRICT  
  
CAMERON COUNTY, TEXAS

---

**DEFENDANT LOWE'S HOME CENTERS, LLC'S JURY DEMAND**

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Defendant, Lowe's Home Centers, LLC *d/b/a* Lowe's, pursuant to the provisions of Rule 216 of the Texas Rules of Civil Procedure, hereby formally makes this demand for a Jury Trial in the above-referenced cause.

Respectfully submitted,

**MAYER LLP**4400 Post Oak Parkway, Suite 1980  
Houston, Texas 77027  
713.487.2003/Fax 713.487.2019By: *Raul I. Saenz*Kevin P. Riley  
State Bar No. 16929100  
[kriley@mayerllp.com](mailto:kriley@mayerllp.com)  
Raul I. Saenz  
State Bar No. 24093092  
[rsaenz@mayerllp.com](mailto:rsaenz@mayerllp.com)**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

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Javier Villareal  
LAW OFFICES OF JAVIER VILLAREAL  
2401 Wildflower Drive, Suite A  
Browsville, Texas 78520  
[jv@jvlawfirm.com](mailto:jv@jvlawfirm.com)  
*ATTORNEY FOR PLAINTIFF*

☒ E-MAIL/E-SERVICE  
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☐ REGULAR, FIRST CLASS MAIL  
☐ CERTIFIED MAIL/RETURN RECEIPT REQUESTED

*Raul I. Saenz*

Raul I. Saenz

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 Bar No. 24093092  
 kkeef@mayerllp.com  
 Envelope ID: 56543341  
 Status as of 8/23/2021 11:02 AM CST

Associated Case Party: JoseLuisCarrizales

Name	BarNumber	Email	TimestampSubmitted	Status
Javier Villarreal		jv@jvlawfirm.com	8/23/2021 10:23:46 AM	SENT

Associated Case Party: Lowe's Home Centers, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Kathy Keefer		kkeef@mayerllp.com	8/23/2021 10:23:46 AM	SENT
Kevin Riley		kriley@mayerllp.com	8/23/2021 10:23:46 AM	SENT
Raul Saenz		rsaenz@mayerllp.com	8/23/2021 10:23:46 AM	SENT
Elizabeth Trevino		etrevino@mayerllp.com	8/23/2021 10:23:46 AM	SENT
Chrysa Williams		CWilliams@mayerllp.com	8/23/2021 10:23:46 AM	SENT



# EXHIBIT 3

*( State Court Docket Sheet)*

Case Information

2021-DCL-03919 | Jose Carrizales vs. Lowe's Home Centers, LLC

Case Number	Court	Judicial Officer
2021-DCL-03919	107th District Court	Euresti, Benjamin, Jr.
File Date	Case Type	Case Status
07/02/2021	Injury or Damage - Motor Vehicle	Pending

Party

Plaintiff  
Carrizales, Jose Luis

Active Attorneys ▼  
Attorney  
Blakeley, Reggie  
Retained

Lead Attorney  
Villarreal, Javier  
Retained

Defendant  
Lowe's Home Centers, LLC  
  
Address  
Serving Registered Agent, Corporation Service Company dba CSC -  
211 E. 7th Street, Suite 620  
Austin TX 78701-3218

Active Attorneys ▼  
Lead Attorney  
RILEY, KEVIN P.  
Retained

Attorney  
Saenz, Raul I  
Retained

## Events and Hearings

07/02/2021 Original Petition (OCA) ▼

Comment

Plaintiff's Original Petition

07/02/2021 Efiled Original Petition Document ▼

Plaintiff's Original Petition

Comment

Plaintiff's Original Petition

07/16/2021 Citation Issued ▼

E-Sig - Citation - Personal Service

Comment

Citation was emailed to cindy@jvlawfirm.com as per e-file instructions

07/16/2021 Citation ▼

Served

08/04/2021

Anticipated Server

Other

Anticipated Method

In Person

Actual Server

Other

Returned

08/16/2021

08/16/2021 Service Return ▼

Return of Service

Comment

Return of Service

08/23/2021 Original Answer ▼

Carrizales - Lowe's Answer to Plaintiff's Petition.pdf (Q)

Comment

Defendant Lowe's Home Centers, LLC's Original Answer to Plaintiff's Original Petition

08/23/2021 Jury Demand ▼

Carrizales - Lowe's Jury Demand.pdf (Q)

Comment

Defendant Lowe's Home Centers, LLC's Jury Demand

08/23/2021 Jury Fee Paid (OCA)

## Financial

Carrizales, Jose Luis

Total Financial Assessment	\$315.00
----------------------------	----------

Total Payments and Credits	\$315.00
----------------------------	----------

7/2/2021	Transaction Assessment	\$315.00
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7/2/2021	E-File Electronic Payment	Receipt # 2021-12724	Carrizales, Jose Luis	(\$315.00)
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Lowe's Home Centers, LLC

Total Financial Assessment	\$40.00
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Total Payments and Credits	\$40.00
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8/23/2021	Transaction Assessment	\$40.00
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8/23/2021	E-File Electronic Payment	Receipt # 2021-16000	Lowe's Home Centers, LLC	(\$40.00)
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## Documents

Plaintiff's Original Petition

E-Sig - Citation - Personal Service

Return of Service

Carrizales - Lowe's Answer to Plaintiff's Petition.pdf (Q)

Carrizales - Lowe's Jury Demand.pdf (Q)

# EXHIBIT 4

*(List of All Counsel of Record)*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

JOSE LUIS CARRIZALES,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CIVIL ACTION NO. _____
	§	JURY TRIAL DEMANDED
LOWE'S HOME CENTERS, LLC	§	
<i>Defendant.</i>	§	

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**COUNSEL OF RECORD AND INFORMATION PURSUANT TO  
LOCAL RULE CV-81(c)**

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(1) A list of all parties in the case, their party type (e.g., plaintiff, defendant, intervenor, receiver, etc.) and current status of the removed case (pending, dismissed);

***Plaintiff*** Jose Luis Carrizales

***Defendant*** Lowe's Home Centers, LLC

The removed case is currently pending.

(2) A civil cover sheet and a certified copy of the state court docket sheet; a copy of all pleadings that assert causes of action (e.g. complaints, amended complaints, supplemental complaints, counterclaims, cross-actions, third party actions, interventions, etc.); all answers to such pleadings and a copy of all process and orders served upon the party removing the case to this court, as required by 28 U.S.C. § 1446(a).

See attached civil cover sheet and documents attached to Defendant's Notice of Removal as ***Exhibit "A."***

(3) A complete list of attorneys involved in the action being removed, including each attorney's bar number, address, telephone number and party or parties represented by him/her;

**LAW OFFICES OF JAVIER VILLAREAL**

Javier Villareal  
State Bar No. 240028097  
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*Counsel for Plaintiff*

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4400 Post Oak Parkway, Suite 1980  
Houston, Texas 77027  
713.487.2000 / F: 713.487.2019

*Counsel for Defendant*  
**LOWE'S HOME CENTERS, LLC**

(4) A record of which parties have requested a trial by jury (this information is in addition to placing the word "jury" at the top of the Notice of Removal immediately below the case number);

Plaintiff, Jose Luis Carrizales has requested a trial by jury;

Defendant, Lowe's Home Centers, LLC has requested a trial by jury.



- (5) The name and address of the court from which the case is being removed.

Cameron County District Court  
Laura Perez-Reyes, District Clerk  
974 East Harrison Street  
Brownsville, Texas 78520